

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**CONSUMER FINANCIAL PROTECTION
BUREAU,**

Plaintiff,

v.

**TOWNSTONE FINANCIAL, INC., et al.,
Defendants.**

Civil Action No. 1:20-cv-04176

Judge Franklin U. Valderrama

Magistrate Judge Gabriel A. Fuentes

DECLARATION OF BARRY STURNER

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am the founder and owner of Townstone Financial Inc., which I started in 2002.
2. Townstone is a non-bank lender offering an array of financial services designed to help people buy homes and refinance mortgage loans.
3. In or about 2006, Townstone launched the Townstone Financial Show, a weekly, one-hour financial talk radio show in which we discussed issues related to home-buying and finance.
4. The Townstone Financial Show originally started on WCKG, 105.9 FM. It later moved to AM 560 The Answer, which is a well-known conservative radio station in Chicago. The Show aired for several years on 560 AM until we moved the Show to a Podcast in 2015. In February 2017, the Townstone Financial Show went back to 560 AM until November 2018. Since then, the Townstone Financial Show has been broadcasted online as a podcast.

5. I have read the Amended Complaint from the Consumer Financial Protection Bureau and I am familiar with all the shows and statements that CFPB cites in the Complaint. Those statements are a small fraction of the amount of time I have hosted the Townstone Financial Show.
6. I am an outspoken conservative with strong views that crime has exploded in Chicago and the city has become more dangerous because politicians fail to address the issue. I am an ardent supporter of the police and frequently make that opinion known. I also often criticize politically correct culture and am a loud critic of the Consumer Financial Protection Bureau and Senator Elizabeth Warren.
7. I routinely voiced these views on the Townstone Financial Show where my cohosts and I often talked about the social and political issues of the day.
8. The Townstone Financial Show often included discussions about these issues—crime, the police, President Trump, and the CFPB—as well as any other issues of the day we found interesting.
9. For example, during a June 24, 2016 show, I praised local police and criticized the media’s portrayal of officers. In my view, officers in Chicago “don’t feel they have the backing of the mayor or City Hall” and officers were often used as “scapegoats.” In my opinion, officers were “the only ones” keeping the South Side “from turning into a real war zone and keeping it kind of where it’s at.”
10. Crime was—and is—another major issue I care about. I often highlight how dangerous parts of Chicago have become. On one Townstone Financial Show, I told a cohost he lived in a dangerous area after he described a cab driver being attacked by criminals. Another time, I expressed concern about jogging near the United Center

because it could be dangerous. I believe more police and more support for officers would help solve these problems.

11. On other Townstone Financial Shows, I criticized the “PC culture from the Obama Administration” and said “Democrats” were “100% wrong” about Obamacare. I said the CFPB’s rules don’t work and that Elizabeth Warren has bad ideas.
12. I am outspoken and clear about these views both on the Townstone Financial Show and in daily life.
13. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2022.

..s/ Barry Sturner
Barry Sturner